

175235

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

P.O. Box 11263  
Columbia, S.C. 29211



Phone: (803) 737-0800  
Fax: (803) 737-0801

DAN EARNETT  
CHIEF OF STAFF

August 18, 2005

**VIA U.S. MAIL**

The Honorable Charles L.A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

Re: Application of Utilities Services of South Carolina, Inc. for Adjustment of Rates  
and Charges and Modifications to Certain Terms and Conditions for the Provision  
of Water and Sewer Service  
**Docket No. 2005-217-WS**

Dear Mr. Terreni:

For your docket, please find enclosed a copy of the Office of Regulatory Staff's Second Continuing Data Request which was served on counsel Utilities Services of South Carolina, Inc. Also, if you would please date stamp the extra copy and return it to me via courier.

Please let me know if you have any questions.

Sincerely,

*Wendy B. Cartledge*

Wendy B. Cartledge

WBC/rng  
Enclosures

cc: John M.S. Hoefer, Esquire

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2005-217-WS**


2005 AUG 18 PM 12:14  
RECEIVED  
PUBLIC SERVICE COMMISSION  
COLUMBIA, SC

IN RE:

Application of Utilities Services of )  
SC, Inc. for Adjustment of Rates and )  
Charges and Modifications to Certain )  
Terms and Conditions for the ) **CERTIFICATE OF SERVICE**  
Provision of Water and Sewer Service )  
\_\_\_\_\_ )

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S SECOND CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

John M.S. Hoefer, Esquire  
**Willoughby & Hoefer, P.A.**  
Post Office Box 8416  
1022 Calhoun Street, Suite 302  
Columbia, South Carolina 29201

  
\_\_\_\_\_  
Rena N. Grant

August 18, 2005  
Columbia, South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2005- 217 -W/S**

SO  
2005 JUN 16 PM 12:14

IN RE:

Application of Utilities Services	)	
Of South Carolina, Inc. for	)	
Approval of New Schedule of	)	<b>Office of Regulatory Staff's Second</b>
Rates and Charges for Water	)	<b>Continuing Data Request</b>
And Sewerage Service Provided	)	
to its Customers	)	
_____	)	

**TO: John M.S. Hoefer, Esquire, Counsel for the Applicant, Utilities Services of South Carolina, Inc.**

**INSTRUCTIONS**

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that the Applicant answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person or an entity, to provide the full name, title, and current address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements,

contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Applicant's responses, the Applicant witness(es) or employee(s) responsible for the information contained in each response be indicated.
- I. That the Applicant provide to the Office of Regulatory Staff two copies of the responses to this data request as soon as possible but no later than ten (10) days after service thereof.

- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Applicant to supplement or amend its responses as any additional information becomes available.

### **QUESTIONS**

- 1.1 Identify the names and business titles of all people who provided information for the preparation of the Application.
- 1.2 Identify the names and business titles of all people who provided information for the preparation of the Application exhibits. Indicate who calculated the numbers for each exhibit and list the appropriate exhibit next to the individual's name.
- 1.3 Identify any construction and/or upgrades proposed for or taking place at facilities operated by Utilities Services of South Carolina, Inc. (hereafter referred to as "USSC")
- 1.4 Identify any subsidiary, parent and affiliated companies of USSC and state which entities, if any, are regulated by the Public Service Commission of South Carolina.
- 1.5 Identify all related party transactions during the test year. Related party transactions include all transactions between USSC and employees, officers, affiliated companies, parent company, subsidiaries and their employees, or officers thereof.
- 1.6 Identify all businesses that share the same office space as USSC.
- 1.7 List all real estate and land rights owned by USSC. If applicable, state the date of the purchases or acquisitions, the purchase price, and the location of the real estate and the physical areas to which any land rights apply.
- 1.8 Provide a detailed listing of the number of residential and commercial customers as of January 1, 2003, December 31, 2004 and August 1, 2005. Provide a detailed breakdown of Exhibit B page 13 by customer classification and service type.
- 1.9 Does USSC claim or anticipate claiming any state tax credits? If so, list the amount of the tax credit (or expected tax credit), and state where it is included in the financial information submitted with the Application.

- 1.10 Identify employees and officers employed at December 31, 2003, and 2004, including their position, date of hire, salary, bonuses, hours worked per week, exempt/non-exempt status, and duties.
- 1.11 State USSC's practices and procedures for employee and officer bonuses.
- 1.12 Provide any written guidelines for inspecting systems and/or performing maintenance on USSC systems.
- 1.13 Describe all outstanding documented violations by the South Carolina Department of Health and Environmental Control (hereafter referred to as "DHEC") if any. If applicable, provide a copy of all documentation from DHEC that discusses the violations along with all responses from USSC.
- 1.14 Provide details and documentation regarding any DHEC fines. If DHEC fines were levied, identify what reasons and in what amounts were the fines issued. Provide a copy of the orders dictating the fines.
- 1.15 If USSC has been impacted monetarily by DHEC fines or violations, state where the impact is illustrated in USSC's financial statements.
- 1.16 Provide the most current DHEC Drinking Water Sanitary Survey for all drinking water system listed on pages 5, 6 and 7 of Exhibit C.
- 1.17 Provide the most current DHEC Wastewater Treatment Facility Operation and Maintenance Evaluation Report for all wastewater systems listed on page 4 of Exhibit C.
- 1.18 Provide a copy of the complete customer complaint log detailing all recorded customer service and billing complaints for the drinking water and sewer systems during the test year ending December 31, 2004.
- 1.19 Subsequent to the last rate case, has USSC had a change in ownership, a change in stock holdings or any change in its ownership structure? If so, set forth and describe the prior ownership arrangement and the current ownership arrangement.
- 1.20 Provide a copy of USSC's performance bond that satisfies the requirements of S.C. Code Ann. §58-5-720 and Public Service Commission Regulations 103-512.3 and 103-512.3.1.
- 1.21 Are there any outstanding loan agreements involving USSC? If so, for each loan:
  - a. State whether the loan is approved and finalized?
  - b. State whether USSC is in receipt of the funds from the loan agreement?
  - c. Provide the loan amount.

- d. Provide the interest rate.
  - e. Provide the loan period in months.
  - f. State the lender.
  - g. State the use or planned use of the loan.
  - h. Provide a copy of each loan agreement, its applicable amortization schedule, and any other relevant documentation.
- 1.22 List by year and by customer classification/bill code, the total number of bills issued to customers during the years 2002, 2003, and 2004.
- 1.23 State whether USSC operates on a calendar or fiscal year. If USSC operates on a fiscal year, please state during which month the fiscal year begins and ends.
- 1.24 Provide a copy of all contracts USSC has with bulk water providers and wastewater treatment and disposal providers.
- 1.25 Provide the calculations used to convert customer classifications to "units" as used in Exhibit B page 12 and 13.
- 1.26 Provide the calculation to convert customer classification to "SFE" as used in Exhibit B page 12.
- 1.27 Provide all water consumption data for the test-year ending December 31, 2004, including gallons billed by bill code, subdivision and test-year month.
- 1.28 Itemize the components of "Regulatory Commission Expense" including legal expenses and postage through the current date.
- 1.29 Provide the amount of accrued interest on customer deposits as of January 1, 2004 and December 31, 2004.
- 1.30 Provide the amount listed in uncollectible accounts as of December 31, 2002, 2003 and 2004, and provide the calculation for the proposed uncollectibles associated with the rate increase.
- 1.31 Provide the amount of water pumped, purchased, and sold by USSC for the twelve months ended December 31, 2002, 2003 and 2004.

August 18, 2005

Wendy B. Cartledge  
Shannon Bowyer Hudson, Esquire  
Wendy Cartledge, Esquire  
**Office of Regulatory Staff**  
P.O. Box 11263  
Columbia, South Carolina 29211